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Goffa International Corporation

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION

KELLYTOY (USA), INC, a California corporation; and KELLYTOY)	CASE NO. 2:18- cv-03016-JAK-AGR
WORLDWIDE, INC., a California corporation,		NOTICE AND MOTION TO DISMISS THE COMPLAINT
)	
Plaintiffs,		Date: July 16, 2018
)	Time: 8:30 a.m.
vs.		Courtroom: 10B
)	The Honorable John A. Kronstadt
GOFFA INTERNATIONAL CORP., a		
New York corporation; and DOES 1)	[Filed concurrently with Notice of
through 10, inclusive,		Motion and Motion to Dismiss;
)	Declaration of Lily Song]
Defendants.		
)	Complaint filed: May 2, 2018

TO THIS HONORABLE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORDS:

Please take notice that on July 16, 2018 at 8:30 a.m., or as soon thereafter as the matter may be heard before the Honorable John A. Kronstadt, United States District Court Judge, presiding in Courtroom 10B of the above-referenced Court, located at First Street Courthouse, 350 W. First Street, Los Angeles, California, defendant Goffa International Corporation will and hereby does respectfully move this Honorable Court for an order dismissing the Complaint and all claims therein for lack of personal jurisdiction, pursuant to Federal Rule of Civil Procedure 12(b)(2).

1 This motion is made following the conference of counsel pursuant to Local
2 Rule 7-3, which took place on May 24, 2018.

3 This Motion will be and hereby is based upon this Notice of Motion and
4 Motion, the accompanying Memorandum of Points and Authorities in support
5 thereof, all other papers submitted and filed with this Notice, the pleadings and
6 papers on file in this action, all matters judicially noticeable, and on such further
7 documentary evidence and oral argument as this Court may allow at the hearing.
8

9 Dated: June 4, 2018

Respectfully submitted,

GORDON & REES LLP

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12 By: /s/ Craig J. Mariam
13 Craig J. Mariam
14 Stephanie L. Cobau
15 Attorneys for Defendant
16 Goffa International Corporation
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